

# **EXHIBIT 3**

**PUBLIC VERSION OF ECF DOC NO. 576  
NO REDACTIONS**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re MULTIPLAN HEALTH INSURANCE  
PROVIDER LITIGATION

*This Document Relates To:*  
ALL ACTIONS

Case No. 1:24-cv-06795

MDL No. 3121

Hon. Matthew F. Kennelly

**DAP AND CLASS PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION TO  
ALL DEFENDANTS PURSUANT TO COURT'S MINUTE ORDER (ECF 307)**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Northern District of Illinois (the "Local Rules"), and consistent with the Court's January 24, 2025 Minute Order (ECF 307), Direct Action Plaintiffs and Class Plaintiffs (collectively, "Plaintiffs") request that Defendants produce the documents, electronically stored information, and things requested herein.

**DEFINITIONS**

1. The definitions and rules of construction set forth in Federal Rule of Civil Procedure 34 are hereby incorporated and shall apply to Plaintiffs' First Set of Requests for Production to All Defendants.

2. The following additional rules of construction also apply to these requests for production:

- a. The singular form of a word includes the plural and vice versa;
- b. The present tense shall be construed to include the past tense and vice versa;
- c. "And" and "or" shall be construed either disjunctively or conjunctively, whichever is appropriate to have the broadest meaning;

- aa. Any fields indicating which MultiPlan OON Repricing Service was applied to the Claim;
- bb. For inpatient hospital services, any fields indicating whether the allowable amount was based on a DRG rate, a fixed percentage discount off of charges (state the discount), or some other basis (and if other, what basis);
- cc. For all other services, any fields indicating whether the allowable amount was based on relative value units, per diem rates, or some other basis (and if other, what basis).

14. “OON Repricing Services” means any product or service that reprices, negotiates, or renegotiates the cost of OON Services. Examples of OON Repricing Services include, but are not limited to, Data iSight, Viant, MARS, Pro Pricer, HST, and Zelis.

15. “Out-of-Network Services” or “OON Services” refers to Healthcare Goods and Services provided to a Patient where the Provider of those Healthcare Goods and Services is not entitled to a fixed, pre-negotiated contractual reimbursement rate for those Healthcare Goods and Services from the Payor.

16. “Patient” means any individual who receives Healthcare Goods and Services from a Provider.

17. “Payor” means any third-party entity, organization, or person that adjudicates or sets prices for Healthcare Goods and Services utilized by Patients covered by Health Plans.

18. “Payor Data Fields” means the following fields of Structured Data concerning each Claim paid by a Payor to a Service Provider for Healthcare Goods and Services:

- a. Service Provider Fields:
  - i. Facility Name